

JOSEPH P. RUSSONIELLO (CSBN 44332)  
 United States Attorney  
 JOANN M. SWANSON (CSBN 88143)  
 Chief, Civil Division  
 CLAIRE T. CORMIER (CSBN 154364)  
 Assistant United States Attorney  
 150 Almaden Blvd., Suite 900  
 San Jose, California 95113  
 Telephone: (408) 535-5082  
 FAX: (408) 535-5081  
 claire.cormier@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

KATHLEEN VENTIMIGLIA,	)	No. 07-05481 RS
individually, and as the Guardian Ad Litem	)	
for STEPHEN VENTIMILIA and KELLIE	)	
VENTIMILIA,	)	STIPULATION AND [PROPOSED]
	)	ORDER CONTINUING CASE
Plaintiffs,	)	MANAGEMENT CONFERENCE AND
	)	RELATED DEADLINES
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
CHAMBLIN-LANDES	)	
CONSTRUCTION, INC., a California	)	
corporation, and DOES 1-50, inclusive,	)	
	)	
Defendants	)	

The initial case management conference for this case is currently scheduled to take place on February 20, 2008. Counsel for defendant United States of America has advised that she is scheduled to be on vacation that day. Accordingly, the parties hereby STIPULATE AND REQUEST that the Court vacate the currently scheduled case management conference and related deadlines and instead order the following schedule for this case:

February 6, 2008	Last day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan;
	last day to file Joint ADR Certification with Stipulation to ADR Process or Notice of Need for ADR Phone Conference

February 20, 2008 Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report; last day to file Case Management Statement

February 27, 2008, 2:30 p.m. Case Management Conference

DATED: January 30, 2008 Respectfully submitted,  
JOSEPH P. RUSSONIELLO  
United States Attorney

/s/ Claire T. Cormier  
\_\_\_\_\_  
CLAIRE T. CORMIER  
Assistant United States Attorney

DATED: January 30, 2008 CORSIGLIA, McMAHON & ALLARD LLP

Electronic signature authorized  
\_\_\_\_\_  
BRADLEY M. CORSIGLIA  
Attorneys for Plaintiffs

DATED: January 30, 2008 EMERSON, COREY & SORENSEN

Electronic signature authorized  
\_\_\_\_\_  
JAMES D. EMERSON  
Attorneys for Defendant,  
Chamblin-Landes Construction, Inc.

**[PROPOSED] ORDER**

Pursuant to the stipulation of the parties and good cause appearing, IT IS SO  
ORDERED.

DATED: \_\_\_\_\_, 2008  
\_\_\_\_\_  
RICHARD SEEBORG  
UNITED STATES MAGISTRATE JUDGE